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February 27, 2009

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VIA HAND DELIVERY

The Honorable Deborah A. Batts  
United States District Judge  
United States District Court, Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 2510  
New York, New York 10007

**Re: Brown v. 17th Street Entertainment II LLC, et al**  
**Court/Index No. SDNY 08 Civ. 7430 (DAB)**

Dear Judge Batts:

We represent Plaintiffs in the above-referenced matter. I write to request a two month extension of the discovery deadline, and corresponding changes to subsequent dates in the scheduling order. Defense counsel have agreed to the extension.

GRANTED  
/DAB/

Discovery is now scheduled to conclude on March 31, 2009. However, the parties are currently involved in an attempt to resolve among themselves disputes over document requests and interrogatories with the hope that it can be done without Court intervention. Because paper discovery is not complete, neither party has yet taken any depositions. In addition, Defendants recently served three third-party subpoenas in response to which Plaintiffs are preparing a motion to quash. The resolution of this motion will further delay discovery.

Accordingly, we respectfully request that the scheduling order be adjusted as follows:

Completion of discovery: June 1, 2009  
Notification of dispositive motions: June 30, 2009  
Submission of proposed requests to charge and proposed voir dire: July 15, 2009  
Submission of joint pre-trial statement ("JPTS"): July 15, 2009  
Memoranda of law addressing issues raised in the JPTS: July 15, 2009  
Responses to the memoranda: July 29, 2009

SO ORDERED

*Deborah A. Batts*

DEBORAH A. BATTS  
UNITED STATES DISTRICT JUDGE

3/4/09